

IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

JAMES L. ROBINSON

121865

PETITIONER

VS.

CASE NO. 2006-1061-MHT

JAMES DELOACH, WARDEN

RESPONDENTS

RETALIATION COMPLAINT MOTION TO
SHOW CAUSE ORDER TO ISSUE

COMES NOW JAMES L. ROBINSON AND FILE THE
ABOVE STYLE MOTION. ROBINSON'S FIRST AMENDMENT
RIGHT TO MEANINGFUL ACCESS TO COURT NOW
COMES, AND GOOD CAUSE BEING SHOWN BEFORE
THIS COURT BY ROBINSON:

1. ROBINSON IS NOW HOUSED AT RED EAGLE
HONOR CAMP; WARDEN CHARLES HADLEY, CAPTAIN
JOSEPH WOMBLE, AND LT. R. NAZLE. CUSTODY
AND SECURITY - RED EAGLE LAW LIBRARY
OFFICIALS.

2. RESPONDENTS ATTORNEY GENERAL TROY KING, NANCY M. KIRBY, ADOC LEGAL DEPUTY: ALAN THOMAS. ADOC PRISON COMMISSIONER RICHARD ALLEN.

3. ROBINSON'S FIRST AMENDMENT RIGHT UNDER UNITED STATES CONSTITUTION IS A PROTECTED RIGHT. ROBINSON PURSUANT TO FEDERAL HABEAS CORPUS HAS UNDER REVIEW TWO STATE STATUTES. CODE OF ALABAMA 1975 SECTIONS 13A-5-9.1 AND CODE OF ALABAMA 1975 SECTION 14-9-41(c)

4. ROBINSON ON DECEMBER 22, 2006 FILED (2) TWO MOTIONS BEFORE THIS HONORABLE COURT (1) MOTION TO AMEND FOR SPECIFICS & TO RELATE TO STATE EXHAUSTED CLAIMS, AND (2) MOTION TO PRODUCE DOCUMENTS.

(A) ROBINSON BY RED EAGLE LAW LIBRARY COMPUTER PRINTER FILED, AND PREPARED THESE MOTIONS FOR COURT'S ACCESS.

5. RESPONDENTS HAVE HARASSED, THREATEN, AND DENY ROBINSON ACTUAL USE OF ADOC COMPUTER PRINTER ESTABLISH IN RED EAGLE'S LAW LIBRARY.

6. ROBINSON'S FEDERAL HABEAS CORPUS LITIGATION WAS DONE IN "GOOD FAITH" FILED AND UNDER FEDERAL JURISDICTION. ROBINSON'S ISSUES ARE UNITED STATES CONSTITUTIONAL VIOLATIONS TO WHICH RELIEF EXISTS AS EXPRESSED.

THE LITIGATION WHICH COMES UNDER 19A-5-9.1 AND 14-9-41(c) HAS SPARKED A FLAME; AND RESPONDENTS HAVE NOW SNUCKED UNCONSTITUTIONAL ACTS DONE UNDER COLOR OF STATE LAW.

7. RESPONDENTS OPENLY ON DECEMBER 26, 2006 PERFORMED A SHakedown OF ROBINSON'S LOCKER AND ASSIGN BED BY CWO FANEY UNDER DIRECT ORDERS OF LT. R. NAZAR. FIRST ALLEGATION OF A MISSING COMPUTER DISC. SECOND QUESTIONS ABOUT ASSISTING OTHER INMATES ON DECEMBER 27, 2006 CAPTAIN JOSEPH WOMBLE CALLED ROBINSON TO CAPTAIN OFFICE, FULL THREATS AND HARASSMENT IN REFERENCE TO ALABAMA PRISON ISSUES UNDER FEDERAL COURT'S JURISDICTION, ALABAMA'S GOOD TIME LAW.

RETALIATION FIRST AMENDMENT

ROBINSON IS BEING RETALIATED AGAINST BY RESPONDENTS FOR EXERCISING, ROBINSON'S FIRST AMENDMENT RIGHT TO ADDRESS FEDERAL COURT UNDER STATE LAWS TO WHICH VIOLATE ROBINSON'S AND OTHERS UNITED STATES CONSTITUTIONAL RIGHTS UNDER THE 14TH AMENDMENT.

ATTORNEY GENERAL TROY KING HAVING FULL CUSTODY PURSUANT TO ALABAMA AND FEDERAL AUTHORITY IN THIS COURT. ATTORNEYS

NANCY M. HZBY, AND ALM THOMAS COME UNDER ADOC FOR COMMISSIONER RICHARD ALLEN, AND NOW WARDEN CHARLES HADLEY. ROBINSON IS BEING DENIED TYPING PAPER, ENVELOPES, AND ACCESS TO COMPUTER PRINTER.

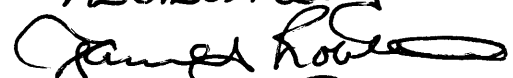
ADOC PRISON COMMISSIONER UNDER AR # 412 PROVIDE ADMINISTRATIVE REGULATION FOR WARDEN HADLEY TO FOLLOW WRITTEN POLICY. ADOC LEGAL DEVISION ALM THOMAS, AND COMMISSIONER ALLEN FOR INMATES AT RED EAGLE PROVIDE COMPUTER FOR INMATE'S ACCESS TO COURT NEEDS. ATTORNEY GENERAL TROY KING OWING A LEGAL DUTY TO PROVIDE ACCESS TO COURT IN SUPPORT DEFRIES V. STATE, 597 SO.2D 742 THE COURT HELD RESTRICTIONS CAN'T DEPRIVE INMATES OF ADEQUATE ACCESS TO COURT.

RESPONDENTS ACTING UNDER COLOR OF STATE LAW HAVE INTENTIONALLY CLOSED THE ACCESS TO COURT BY AND THROUGH RETALIZATION AGAINST ROBINSON. ROBINSON'S SIXTH AMENDMENT RIGHT PROTECTED BEING THE MOTIVATING FACTOR FOR THESE RESPONDENTS ACTS OF RETALIZATION. IT BEING TRUE THAT IF ROBINSON PREVALES TO PROVE THAT 13A-5-9.1 AND 14-9-41(c) VIOLATES THE EQUAL PROTECTION CLAUSE UNDER THE 14TH AMENDMENT, A MAJOR RULING RENDERS RELEASE OF JAMES ROBINSON, AND OTHERS SMOAL -4-

RELIEF EXIST IN THIS MOTION

1. ROBINSON'S HAS ESTABLISHED AND SHOWN THE 1ST AMENDMENT RETALIATION BY RESPONDENTS.
2. A FULL SHOW CAUSE ORDER TO ISSUE, WHERE ACCESS TO COURT COMPUTER EQUIPMENT, COMPUTER, AND SUPPLIES COME UNDER FULL WRITTEN STATE LAWS, AND ADMINISTRATIVE REGULATIONS GOVERN BY STATE STATUTE. UNITED STATES CONSTITUTION EXIST, AND BOTH STATE AND FEDERAL CASE LAW RULING SUPPORT ACCESS TO COURT.
3. ROBINSON HAS CLAIMS THAT MERIT RELIEF BEFORE THIS COURT. HALL V. SUTTON, 755 F.2d 786 (11TH CIR. 1985) THE 1ST AMENDMENT CONSTITUTIONAL RIGHT TO MEANINGFUL ACCESS TO COURT.
4. ROBINSON SEEKS A FULL ORDER FROM THE HONORABLE JUDGE TO CEASE ALL ACTS OF RETALIATION, WHERE ROBINSON HAS NOT VIOLATED ONE SINGLE RULE OF ADOC, NOR ENGAGED IN ACT OF ILLEGAL CONDUCT.
5. THE ORDER SHOULD ISSUE WHERE ACTUAL INJURY, AND DANGER OF THREATS, AND OTHER UNCONSTITUTIONAL ACTS ARE TOO SERIOUS TO OVERLOOK.
6. TO ANY AND ALL RELIEFS DUE AFTER CAREFUL REVIEW OF ROBINSON'S MOTION.

RESPECTFULLY


JAMES ROBINSON

1290 RED EAGLE ROAD
MONTGOMERY, AL. 36110
DECEMBER 29, 2006

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY AND SAY THAT I HAVE
SERVED ATTORNEY GENERAL:

NANCY M. KERRY

11 SOUTH UNION ST.

MONTGOMERY, AL. 36130

WITH A COPY OF THE SAME, PLACED IN RED ENVELOPE
LEGAL MAIL POSTAGE FOR PROPER MAILING. DONE
THIS 29TH DAY OF DECEMBER 2006 BY MY
SIGNATURE BELOW.


JAMES ROBINSON